

TENNESSEE WORKFORCE INVESTMENT SYSTEM

State Plan Annual Update For The Vocational Rehabilitation Services Program

Title I – Part B

Title VI – Part B

Fiscal Year 2008

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Division of Rehabilitation Services**

**DIVISION OF REHABILITATION SERVICES
TITLE 1, PART B AND TITLE VI, PART B STATE PLAN ANNUAL UPDATE
FISCAL YEAR 2008**

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Attachments to Title I State Plan**Attachment 4.2 (c) - Input of State Rehabilitation Council**

The State Rehabilitation Council (SRC) is established in Section 105 of the Rehabilitation Act of 1973, as amended (Act), and 34 CFR 361.16-361.17 of its implementing regulations. The SRC gives advice to and works in partnership with the Vocational Rehabilitation (VR) Division. The State Rehabilitation Council met on April 5, 2007, for the purpose of reviewing, providing input and recommendations to the State Plan Annual Update Title I, Part B and Title VI, Part B supplement. Input from the Council is inserted throughout the Plan including the following recommendations and the Division's response.

1. The State Rehabilitation Council continues to express concerns relative to the need for increasing the appropriation of State dollars to allow the Division to more effectively utilize the available Federal dollars in the Title I Basic Support Program. The Council expressed concern relative to the Division's continued operation under an Order of Selection and the growing number of eligible individuals that cannot be served due to funding limitations. As of 3/31/2007, the number of eligible individuals on the waiting list in closed Priority Categories not receiving services was 9,930.

The SRC recommends the Division pursue other internal cost savings measures before giving consideration to changes that affect client services, to the maximum extent possible.

The SRC further commends the Division for the change in their procedures to reduce the number of contacts with individuals in closed Priority Categories to the minimum amount required by law, as one such cost savings measure.

In an effort to expand service delivery to closed priority categories, the State Rehabilitation Council would ask the Division to support the State Rehabilitation Council in efforts to educate the Governor's office and members of the General Assembly, as well as federal funders, about the numbers of people with disabilities being denied services. The State Rehabilitation Council encourages the Division to include as one of its top priorities a budget improvement request to get adequate state funding to open up the closed priority categories.

RESPONSE: The Division has adequate state funding to draw down all available federal dollars, and the Division was successful in securing reallocated federal funds at the close of FY 06 as well as enough state dollars to match those reallocated federal funds. Still, the Division of Rehabilitation Services has not been able to provide services to all eligible individuals who have applied. Therefore, implementation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, is still warranted. The Division will continue to operate under an Order of Selection during Fiscal Year 2008. The Order of Selection serves as a means of prioritizing service to eligible individuals according to the functional limitations stemming from disability.

Services and expenditures are monitored on a continuous basis to enable the Division to close or open priority categories as deemed appropriate. The Division continues to monitor carefully programs, expenditures, and staffing patterns and will continue to pursue internal cost savings measures.

2. The State Rehabilitation Council supports the Division's efforts toward achieving the

Comprehensive System of Personnel Development (CSPD) requirements. The Council recommends the Division continue to aggressively pursue all available training slots at those universities receiving Federal Rehabilitation Services Administration (RSA) grants for Vocational Rehabilitation Counselors to obtain a Master's Degree in Rehabilitation Counseling. The Council acknowledged and congratulated the Division for its continued efforts in securing a competitive entrance level of pay through the Department of Personnel for new Vocational Rehabilitation Counselors with a Master's Degree in Rehabilitation Counseling and for its continued efforts in securing a pay incentive for those incumbent Vocational Rehabilitation Counselors who obtain a Master's Degree in Rehabilitation Counseling.

However, since CSPD requirements became part of the Rehabilitation Act by regulation in 2001, allowing for a five year window for implementation, the SRC recognizes that the Division still lacks the appropriate number of Qualified VR Counselors to serve VR consumers in Tennessee.

Therefore, the SRC recommends the Division take a more aggressive approach to finding and retaining Qualified Rehabilitation Counselors, as well as providing additional incentives to incumbents who obtain the Certified Rehabilitation Counselor Certification. Several strategies should continue to be explored by the Division including: 1) revising job qualification specifications for VR Counselor 1 which allows for a Bachelors Degree and subsequent promotion to VRC 2 after completion of one year of employment to instead require a Masters Degree in Vocational Rehabilitation at entry level; 2) consider a "career ladder" system, which would allow for those obtaining a CRC to become promoted to a VRC 3 or VRC 4 who would then fill a "team leader" role in each VR office; 3) require a Masters Degree in Vocational Rehabilitation to be promoted to Supervisor; 4) continue efforts to recruit future Qualified Rehabilitation Counselors from within the ranks of VR clients by providing incentives to recent college graduates to pursue a Masters in Vocational Rehabilitation; and 5) continue to recruit from the VR Masters Programs within Tennessee universities but also expand the recruiting efforts to neighboring states.

Many of the education incentives are only incentives to current employees of the Division. The State Rehabilitation Council recommends exploration of strategies to increase the "hiring pool" of individuals who are not current employees of the Division by considering incentives to individuals to pursue a career in Rehabilitation similar to those utilized by Tennessee Department of Education (DOE). We encourage the Division to 1) Examine the structure and cost for a program similar to BASE-TN (Be a Special Educator in Tennessee) which provides a "multi-dimensional approach to recruitment, preparation and retention of special education teachers." The program provides limited financial support for eligible individuals interested in pursuing an initial Tennessee teacher license or endorsement in special education in exchange for teaching special education for a public school in Tennessee. 2) The Division is encouraged to explore no or low cost strategies that streamline a degree or certification in Rehabilitation to attract individuals with some education, experience and interest in rehabilitation: a) Teach Tennessee through the TN DOE utilizes existing education and experience.

This is a statewide program that challenges mid-career professionals, retirees and others to teach by providing an initial intensive 2 week institute and ongoing mentoring. Transition to Teaching (T2T) provides minimal financial incentive and an alternative way to seek licensure to those willing to teach needed subjects in specified counties or school systems. b) Programs designed with higher education which streamline getting a graduate degree and certification in a specified field. For example, M.A.T. programs (Master's of Art in Teaching) offered at several universities build upon existing bachelors degrees in a related field, to provide the

additional classes and experience needed to become a certified teacher and earn a Master's Degree.

RESPONSE: The Division does collaborate with State Department of Personnel to get competitive salaries for new hires, as well as pay adjustments for incumbent counselors that obtain their Master's Degree in Rehabilitation Counseling. The Division does have the ability to provide pay incentives to those incumbent Vocational Rehabilitation Counselors (VRCs) who successfully complete a Master's degree in rehabilitation counseling under our CSPD initiative. Additionally, the Division does and will continue to aggressively pursue all available training slots at universities receiving Federal Rehabilitation Services Administration (RSA) grants for Vocational Rehabilitation Counselors to obtain a Master's Degree in Rehabilitation Counseling.

The Division has the goal of hiring as many VRCs as possible who already have a Master's degree, and the Division has worked with the Department of Personnel to ensure that VRC applicants holding a Master's degree in rehabilitation counseling receive extra weight in the rating process so that they are more reachable on the career service register. There are simply too few candidates holding Master's degrees in rehabilitation counseling in the applicant pool. Therefore, to require a Master's Degree in Vocational Rehabilitation at entry level would mean that the Division could not fill a number of open positions, particularly in rural areas. This would have a detrimental effect on client service. Similarly, to develop a VRC classification limited to VRCs holding Master's degrees in rehabilitation counseling would require limiting some VRC functions such as eligibility determination and plan development to one half of incumbent counselors and to new counselors holding Master's degrees, for which the qualified applicant pool is already too small. Again, clients would suffer from the resulting staff shortage.

The Division continues to look at ways to increase the applicant pool of candidates holding Master's degrees in rehabilitation counseling. We are exploring the possibility of designating a staff position with total responsibility for our CSPD activities, including recruitment activities for applicants who already have a Master's degree in rehabilitation counseling and working with rehabilitation counseling Master's programs inside and outside of Tennessee to increase the qualified applicant pool.

The Division appreciates the suggestion to look to models in the Department of Education and other state agencies, and sees this as an opportunity for further exploration. The Division recognizes the value of structuring special programs and does have the ability to provide concentrated training to those staff members who have core related training. However, we do not have the capability of alternative training, as we are bound by the requirements of the training institutions and by the requirements of the national certifying body.

3. The State Rehabilitation Council recommended that the Division create funding sources for advertisement at the local level for SRC activities such as public hearings and Council meetings to enhance consumer awareness and participation. The Council will continue to work with the Department of Human Services/Division to expand the Rehabilitation Services' current web site to include a description of the State Rehabilitation Council and to include a link to Council member names and contact information. The State Rehabilitation Council would like to encourage the Division to place their Vocational Rehabilitation Policy Manual (VRPM) online for public access. The Council commends the Division for its innovative use of electronic media to gather public comment during State Plan Public Hearings in 2007

and encourages the expansion of this method during 2008 with increased public awareness.

RESPONSE: Last year, the Division made available a link on the Department's website and the services of its webmaster for the State Rehabilitation Council to provide content. The Division will continue to provide this access to the SRC. The Division is committed to the expansion of available information to give the community greater access to information about the Rehabilitation Services program, including the State Rehabilitation Council, Statewide Independent Living Council, Centers for Independent Living and the Client Assistance Program as well as the Division's policy manual (VRPM). For the past two years, the Division has placed the draft State Plan on the Internet, and the public does have the opportunity to make comments electronically. All public hearing comments on the FY2008 Title I State Plan will be shared with the State Rehabilitation Council. The Division and the State Rehabilitation Council create an annual resource plan to ensure that the SRC has sufficient funds to carry out its functions. The Division again will develop an adequate resource plan with the SRC.

4. The State Rehabilitation Council acknowledged and congratulated the Division for its continued efforts serving transition age clients. The Council recommends the Division continue to support the Transition School to Work Program by increasing its public relation activities to parents about Vocational Rehabilitation's role in providing transition services and by educating local educators regarding the benefits of the Transition School to Work Program. More specifically, we encourage an education campaign to correct educators' misconceptions about VR services after going to an order of selection, which are often passed on to older students and young adults with disabilities and their family, and often discourages individuals from seeking VR services.

The Council supports the Division's efforts to secure State positions (Vocational Rehabilitation Counselor) for the Transition School to Work Program. Currently VR has 27 cost-sharing contracts to provide transition services to specific school systems. The number of contracts steadily dropped after Tennessee went under an Order of Selection and has remained static. We encourage the Division to develop additional contracts by continuing to develop relationships with school systems, encourage multiple school systems to contract for a position if it is not affordable to fund one full position, and to consider allowing partial funding of a position. The Council encourages the Division to continue to educate VR staff serving in areas where the schools do not have a contractual relationship. Education should focus on their responsibilities to transition age students and how to outreach to local educators about VR's role during transition.

The Division is commended for its upcoming participation in the TN Mega-Conference, a state conference heavily attended by parents and professionals. The Council applauds the Division for permitting state-level and local staff the flexibility to present to transition related forums targeted to reach parents and/or education staff. The Council recognizes that increased visibility among families and the agencies who serve them will improve understanding of Transition and other services provided by VR. The Council also recognizes that the earlier VR interacts with individuals with disabilities and their families, the more successful the students with disabilities will be in entering and staying in the workforce.

The SRC also commends the Division for allowing the School to Work Coordinator to participate in activities with the statewide Transition Leadership Team through the TN Department of Education.

Team membership includes representatives from Department of Labor, Local Education Agency Representative, Disability Law and Advocacy Center, RSA funded Parent Information and Training (PIT) program, higher education, and other agencies as appropriate. Increased multi-agency collaboration and communication at all levels contributes to better opportunities and employment outcomes for individuals of all ages.

RESPONSE: The Division of Rehabilitation Services (DRS) will continue the Transition School to Work (TSW) program initiative. DRS will continue to use its collaborative relationship with the Division of Special Education to join forces in providing information to the Local Education Agencies, with emphasis on those school systems which have indicated a strong interest in the program. An aggressive public relations activity to inform the Local Education Agencies, students, and their parents about the Transition program and the services available through the DRS will continue. In addition, the Division will continue its outreach efforts through brochures and participation at community and statewide events to inform educators, students, and families about eligibility, Order of Selection, and availability of services.

The Division secured, in Fiscal Year 2006, state positions (Vocational Rehabilitation Counselor) for the transition program initiative. While the number of counselor positions is determined by the State Department of Personnel, the Division will continue to seek innovative ways to ensure that all school systems receive appropriate and adequate transition services. Our general caseload counselors provide transition services to any schools with which we do not have a contractual partnership.

The Division appreciates the Council's recognition of efforts to educate parents and professionals through such avenues as the MegaConference, cooperative activities with other agencies, and board/committee representation by our Division's Transition Coordinator.

5. The State Rehabilitation Council recommends that the Division aggressively pursue agreements with other Employment Networks under the Ticket to Work and Work Incentives Improvement Act (TWWIIA) legislation to ensure that SSDI and SSI recipients have the best services possible to enable them to return to work. The Council also recommends that the Division develop a better partnership with Career Centers throughout the State of Tennessee, by offering to provide VR expertise; improved referral sources; and training for Career Center staff to better serve persons with disabilities seeking employment. The State Rehabilitation Council would also like to request that someone from the Statewide Workforce Investment System, or a Career Center, be added as an active member of the SRC, and that the SRC be provided training on this system, the Disability Navigator Program, and Ticket to Work at a future SRC meeting. The SRC also looks forward to touring one of the local Career Centers in the future, possibly during the SRC 2007 Spring/Summer Retreat. The SRC would like to commend the Department of Human Services for designating the Division of Rehabilitation Services as its proxy representative to the Statewide Workforce Investment Board, and for the involvement of DRS staff at the local level on Local Workforce Investment Boards.

RESPONSE: The Division of Rehabilitation Services will continue its ongoing efforts to expand client resources for vocational rehabilitation services by pursuing additional cooperative agreements with other Employment Networks located in Tennessee to provide services to SSDI and SSI recipients under the Ticket to Work

Program. The Division will continue to provide Career Center staff with consultation and technical assistance toward working with people with disabilities through co-located VR Counselors, Memorandums of Understanding and Career Center Operator Consortium Agreements with Local Workforce Investment Areas. The Division will also continue serving on Local Workforce Investment Boards, collaborative efforts with the Disability Program Navigators, Letters of Understanding for specialized services, cross-informational training of Career Center staff, Career Center accessibility and accommodation reviews, and recommendations and participation in development of the Local Area and State Workforce Investment Plans.

The Division relies upon the SRC to recommend nominations for membership appointments and encourages the SRC to submit to the Division more nominations from the state workforce investment system if it so chooses. The representative of Statewide Workforce Investment Board resigned from the SRC, but the Governor filled this vacancy in March 2007.

The Division will work with the SRC executive committee to schedule training at a future SRC meeting on the Statewide Workforce Investment System, the Disability Navigator Program, and/or Ticket to Work program.

6. The State Rehabilitation Council recommends that the Division continue to work with Institutions of Higher Education (IHE) to insure that all clients are receiving needed services. The Council commends the Division's extensive efforts in securing an agreement with the Tennessee Board of Regents. The State Rehabilitation Council would encourage the Division to continue their efforts with the other college system(s) in the state that identifies the responsibilities of each entity related to services and payment for services.

RESPONSE: The Division of Rehabilitation Services successfully negotiated, as of September 26, 2006, an agreement with the Tennessee Board of Regents that outlines the roles and responsibilities of the IHEs, the Division, and the clients/students. The Division is continuing its efforts to secure similar agreements with the University of Tennessee system.

7. The State Rehabilitation Council acknowledged and congratulated the Division for achieving a 96.5% satisfaction rating as reported by Consumer Satisfaction Survey program for Fiscal Year 2006 and an 87.3% satisfaction rating for unsuccessful outcome closures. The Council thanked the Division for implementation of their recommendation that the Consumer Satisfaction Survey program be expanded to include surveys of consumers that are actively receiving services (94.5% satisfaction rating) from the Division.

The Council expressed concern regarding specific issues with the Satisfaction Survey. The Council encourages the Division to work collaboratively with the Council's Consumer Satisfaction and Needs Assessment Committee in addressing these issues.

RESPONSE: The Division of Rehabilitation Services continues to value quality services that result in high consumer satisfaction ratings. The Division values the continued input of the Council in all phases of the consumer satisfaction process and will work collaboratively with the SRC's Consumer Satisfaction and Needs Assessment Committee in addressing and resolving any concerns with specific issues related to the consumer satisfaction process and/or statewide needs assessment activities.

8. The State Rehabilitation Council wishes to thank the Division for its support for the 2nd Annual SRC Orientation & Retreat to be held in Spring/Summer 2007. In addition, the State Rehabilitation Council wishes to thank the Division for making available a teleconferencing system for use by SRC Subcommittees between quarterly meetings. To ensure appropriate involvement by SRC members in national training opportunities, the SRC Resource Plan should include adequate funds for members to attend such meetings along with their personal care attendant or sighted guide.

RESPONSE: The Division of Rehabilitation Services recognizes the value of the input that the Council provides and is pleased to have the opportunity of supporting the SRC Orientation and Retreat and of providing teleconferencing capabilities to increase efficiency of communication by SRC subcommittees between quarterly meetings. The Division is providing an extended, facilitated retreat for the SRC in June 2007. In addition to sponsoring SRC attendance at the semi-annual CSAVR meetings, the Division began in November 2006 sponsoring SRC representation at the semi-annual meetings of the National Council of State Administrators of the Blind. The Division always ensures that SRC members have all necessary accommodations, based on individual needs and circumstances, for SRC members to attend meetings and national training programs. The Division will continue to work with the State Rehabilitation Council to ensure that the resource plan for FY2008 is sufficient to carry out the functions of the Council.

9. The SRC encourages the DRS to continue to enforce the Randolph/Sheppard priority and pursue new vending facility locations for licensed blind vendors. The SRC congratulates the Tennessee Business Enterprise (TBE) program for recruiting the BLAST (Business Leadership and Superior Training) sponsored by the National Association of Blind Merchants, to Tennessee so the licensed blind vendors can get involved in the consumer movement and take advantage of the nationally recognized training agenda. The SRC encourages the DRS and TBE to continue to recruit national training programs to Tennessee and continue to urge participation in consumer and advocacy organizations.

With the active participation of Blind Vendors, the Department should develop strategies to educate the members of the General Assembly about the benefits and successes of the Tennessee's Randolph Sheppard Program and aggressively pursue new locations so that business ownership opportunities are available in the future to VR clients who are legally blind.

RESPONSE: The Division of Rehabilitation Services will continue to enforce the federal and state laws that grant a priority to blind persons to manage and operate vending facilities on government properties. The Agency has a proven record in this regard as evidenced by its willingness to take to litigation counties that have refused to allow blind vendors to manage their inmate commissaries. The Division will work with the Committee of Blind Vendors and consumer groups to develop materials that the Committee members and consumer groups can use to educate members of the General Assembly about the program. The Division is thankful for the Council's recognition for attracting BLAST to Tennessee last year. The Division is actively working with NABM to return BLAST to Tennessee (Memphis) in April, 2008.

10. The State Rehabilitation Council recommended the Division aggressively pursue partnerships with other state and local organizations, profit and non-profit, to improve

opportunities for consumers in securing and maintaining employment. The Council recognizes employment for a person with a disability is often dependent on more than job training and is often outside the mandate of the Division; other issues such as accessible housing, accessible transportation, availability of personal care attendants, continued accessibility to the health care system, etc., must also be addressed to achieve successful employment.

The Council recommends outreach and networking activities by the Division as an essential strategy to develop successful partnerships with organizations outside the Division to meet these needs.

RESPONSE: The Division has, as one of its major strategic goals, pursuit of partnerships and networking with service providers at the state and local levels to meet the support needs of our clients and, thus, to improve opportunities for our clients to secure and maintain employment. The increased emphasis on strengthening partnerships includes resource mapping to track identified resources and gathering feedback from stakeholders to evaluate our performance.

11. The State Rehabilitation Council recommends that all documents and other forms of communication from the Division to consumers, the general public and Division staff, be in an accessible format or be available in an accessible format at the request of the recipient. The Council recommends that no document be distributed by the Division to consumers, the general public, or Division staff unless it is also available in an accessible format. The Council recommends that electronic document formats such as PDF continue to be utilized if a text version of the document is also provided at the time of distribution. The Council recommends that website materials be in an accessible format. The Council recommends that forms be created using the appropriate accessible formatting based on screen reader requirements to insure forms can be completed on a computer or other electronic device.

The Council also recommends that all equipment purchased or leased by the Division for general use by staff, such as copy machines, fax machines, etc., be fully accessible.

The Council also recommends that the Division incorporate language in all contracts that require documents, such as project updates, final reports, etc., be provided to the Division in accessible formats.

RESPONSE: The Division is committed to ensuring that all communications with the public be accessible to persons with disabilities and that its employees have reasonable accommodations in the workplace.

12. The State Rehabilitation Council recommends that the Division ensure that clients who are blind are able to make informed choices about facility based services, appropriate information should be shared with clients about facilities that provide immersion training and VR Counselors should receive such immersion training so they can better understand blindness.

RESPONSE: The Division requires counselors to provide clients with information about training options to allow them to make informed choices about their rehabilitation process. Additionally, the Division provides continuous staff training on the latest rehabilitation services. The Division has invited one of the centers that teaches immersion training to make a presentation to the VR counselors who serve clients who are blind.

Attachments to Title I State Plan**Attachment 4.8(b)(1) - Cooperation with Agencies Not Carrying Out Activities Under the Statewide Workforce Investment System**

The Division has ongoing interagency cooperation, collaboration, and coordination with other entities that are not components of the Statewide Workforce Investment System.

The Division works in cooperation with:

The Department of Children's Services in serving youth with significant disabilities;

The Department of Health in providing services to individuals with Traumatic Brain Injuries (TBI) and alcohol and drug abuse disabilities;

Post-secondary school systems in the provision of services to individuals with physical and mental disabilities;

The Department of Corrections and local police and sheriff's offices in the provision of services to individuals with significant disabilities being released from correctional facilities;

The Department of Human Services, Division of Family Assistance regarding Families First participants with known or suspected disabilities; and

The Department of Mental Health and Developmental Disabilities and the Department of Finance & Administration, Division of Mental Retardation Services in the provision of services to individuals with mental health and intellectual disabilities.

Attachments to Title I State Plan**Attachment 4.8(b)(2) - Coordination With Education Officials**

The Division of Rehabilitation Services maintains an ongoing interagency agreement with the Tennessee Department of Education, Tennessee Department of Children's Services, Tennessee Department of Finance and Administration, Bureau of TennCare, Division of Mental Retardation Services, Tennessee Department of Health and the Tennessee Department of Mental Health and Developmental Disabilities. The agreement resolves to meet the individual needs and maximize the capabilities of individuals with disabilities. The agencies cooperate in developing and coordinating services for youth with disabilities within each respective Agency's legal authority. The ultimate goal of each Agency participating in the agreement is to provide, or cause to be provided, a continuum of appropriate services leading to transition from school into employment. The agreement provides for:

1. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including vocational rehabilitation services;
2. transition planning by personnel of the Division of Rehabilitation Services and the educational agency for students with disabilities that facilitates the development and completion of their individualized education programs under section 614(d) of the Individuals with Disabilities Education Improvement Act (IDEA) of 2004 (P.L. 108-446);
3. the roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; and
4. procedures for outreach to and identification of students with disabilities who need transition services.

The interagency agreement is reviewed and updated annually to ensure that all entities remain focused on "transition services" as those coordinated activities for a student, designed within an outcome-oriented process that promotes movement from school to post-school activities. These activities include post-secondary education, vocational training, integrated employment to include supported employment, continuing and adult education, adult services, independent living services, and community participation. There is on-going coordination and collaboration to ensure that "transition services" are based upon the individual needs of a student, taking into account the student's preferences and interests. Activities must include instruction, community experiences, the development of employment and other post-school adult living objectives to include daily living skills and functional vocational evaluations as appropriate.

A Vocational Rehabilitation (VR) Counselor is assigned to work with each LEA for the purposes of case finding and the provision of vocational rehabilitation services to eligible students. VR counselors provide technical assistance to school personnel (LEAs) to help them understand who is an appropriate referral for vocational rehabilitation services. It is the Division's policy that the development and approval of the individualized plan for employment (IPE) occur by the time each student determined eligible for VR services leaves the school setting

Outreach and early involvement are essential to our “transition” initiative. During fiscal year 2006, approximately thirty (30) percent of the Division’s referrals were from school systems. There are 138 Local Educational Agencies (LEAs) in Tennessee and current records indicate that there are 5,635 students receiving special education services between the ages of 18-21. There are 52,057 students between the ages of 12-17 receiving special education services. These numbers do not include students with physical disabilities that do not meet the criteria for special education services (commonly referred to as Section 504 students). It is anticipated that numbers and percentages of individuals receiving transitioning services will continue to increase as more systems initiate programs and existing programs mature.

When a student who is IDEA eligible reaches the age of fourteen (14), the Individualized Education Program Team (IEP Team) formulates an Individualized Transition Plan (ITP) that will include the transition service needs of the student. VR staff are invited and to the extent possible participate in these IEP meetings. When the student who is IDEA eligible reaches age sixteen (16), or younger if determined appropriate by the IEP Team, the ITP will include a statement of needed transition services and identifies the agency responsible for providing and paying for the services. VR staff are invited and to the extent possible participate in these IEP meetings. If the IEP Team determines that the student should be referred for vocational rehabilitation services, the student must be present at the IEP Team meeting when the referral is made. VR staff are to be available to inform the student and parents of the purpose of the vocational rehabilitation program, the application procedures, the eligibility requirements, and the potential scope of services that may be available. VR staff assist in the formulation of IEP/ITPs and secure a copy for the student’s VR case record if the student is eligible for vocational rehabilitation services.

The interagency agreement relates the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEA eligible receive “Free appropriate public education” (FAPE) in the least restrictive environment. “Free appropriate public education” (FAPE) means regular and special education and related services which:

- (a) Are provided at public expense, under public supervision and direction, and without charge to the parent;
- (b) Meet the standards established by state law, including the requirements of IDEA Part B and the Rules, Regulations and Minimum Standards for the Governance of Tennessee Public Schools, issued by DOE;
- (c) Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education) and
- (d) Are provided in conformity with an individualized education program (IEP). 34 CFR §300.13.

The interagency agreement relates the financial responsibility of the Division of Rehabilitation Services (DRS) to ensure that individuals who are IDEA eligible and also meet the Division's eligibility requirements will receive "Vocational Rehabilitation Services". "Vocational Rehabilitation Services" means any services necessary to determine eligibility and those services described in an individualized plan for employment (IPE) necessary to assist an individual with a disability in preparing for, securing, retaining, or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual.

The LEA is responsible for the educational costs related to the provision of special education and related services for the individual attending school. The agreement relates that if another public agency is obligated under federal or state law or assigned responsibility under state policy to provide or pay for any services that are considered special education or related services and are necessary for ensuring FAPE to students who are IDEA eligible, the public agency shall fulfill that obligation or responsibility, directly, through contract or by another arrangement. However, failure of that public agency to pay for that service does not relieve the LEA of its obligation to provide that service to an individual with a disability in a timely manner.

The Division of Rehabilitation Services is responsible for all costs necessary for eligibility determination and provision of services under an individualized plan for employment (IPE). The Division must take into account comparable services and benefits [Sec 101 (a)(8)(A)] available under any other program that does not interrupt or delay the progress of the individual toward achieving the employment outcome identified in the IPE.

The Division has a dedicated full-time State office position to serve as Transition Coordinator. This position serves as liaison with the State Department of Education and other partners in interagency agreement to provide technical assistance and training related to vocational rehabilitation services. This position works with VR counselors to improve access and services for students with disabilities. This position identifies, arranges for, or provides training to VR counselors, CRP's, educators, students with disabilities, families, adult service agencies in a variety of areas related to "transition" services.

VR staff maintain a working relationship with special education supervisors, vocational education supervisors, directors, secondary school guidance counselors for the purpose of providing outreach for students with disabilities and technical assistance to school personnel to assist the LEAs to prepare students with disabilities for career opportunities. VR staff participate in in-service training programs of the LEAs, as well as, in statewide special education conferences for the purpose of providing information regarding vocational rehabilitation services. VR staff participate in local community job fairs, job clubs, attend civic club/organization meetings to inform students and parents of the purpose of the vocational rehabilitation program, the application procedures, the eligibility requirements, and the potential scope of services that may be available. The Division has developed and utilizes a small bi-fold pamphlet entitled "HELPING STUDENTS WITH DISABILITIES ACHIEVE SUCCESS" in our outreach activities. Other outreach activities include completion of "STUDENT SURVEY" forms coordinated with special education teachers and school guidance counselors.

The Division of Rehabilitation Services (DRS) contracts with Local Educational Agencies (LEAs) as part of its “transition” initiative. The contracts provide for the Local Educational Agencies (school districts) to employ Case Manager Assistants and Secretaries to work under the administrative supervision of the Division of Rehabilitation Services. All services provided under these contracts/agreements have a vocational rehabilitation focus. All services provided under these contracts/agreements are in keeping with all State plan requirements to include our State’s order of selection requirements. Services provided under these contracts/agreements are only available to applicants for, or recipients of, services of the Division of Rehabilitation Services.

Although, the Division utilizes contracts with LEAs as part of its “transition” initiative, all decisions affecting eligibility for vocational rehabilitation services, the nature and scope of available services, and the provision of these services remain the sole responsibility of the Vocational Rehabilitation Counselor employed by the Division. VR staff are responsible for the determination to close cases and for all allocation of expenditures for services.

Attachment 4.8(b)(3) - Cooperative Agreements with Private Nonprofit Organizations

Based on information gathered by continuing statewide studies, the annual facility survey of public and private community rehabilitation programs and the on-going monitoring and annual evaluation of effectiveness, the Division continues to maximize the use of community rehabilitation programs to provide rehabilitation services in the most integrated setting possible consistent with the informed choices of the individual.

The Division is utilizing Community Rehabilitation Programs throughout the State as follows:

1. The Division's Facility Program:

- A. The Tennessee Rehabilitation Center at Smyrna is a State operated comprehensive residential rehabilitation facility that serves individuals with significant disabilities. The facility is accredited by the Commission on Accreditation of Rehabilitation Facilities in programs of Comprehensive Vocational Evaluation Services, Employee Development Services, and Employment Skills Training Services. The Center offers the following program and support services:

Program Services

- Comprehensive Vocational Evaluation and Mobile Evaluation Services.
- Job Objectives and Behavioral Services, a pre-vocational work adjustment training program.
- Occupational Skills Training in Automotive Maintenance/Detailing, Building Maintenance and Grounds Keeping, Business Education, Custodial, Food Service, Hospitality Worker, and Warehouse training.
- Physical Rehabilitation Services to include: Occupational, Physical and Recreational Therapy; and Rehabilitation Nursing Services. Outpatient services are also provided in Occupational and Physical Therapy Services and Adaptive Equipment Assessments.
- Traumatic Brain Injury Services to include: Occupational, Physical, and Speech/Language Therapy; Vocational Education and Evaluation; Remedial Education, Behavioral Instruction, and Job Placement services.
- Transitional Life Skills Training to include: Managing Self-Care and Daily Living Skills; Home Management Skills and Practices; Financial Management Skills and Practices; Mobility and Transportation Issues; Health Maintenance; Recreational and Leisure Skills Development; and Civil Rights and Advocacy.
- Vision Impairment Services to include: Pre-Vocational Assessment and Training for Independent Living; College Preparation Services; Assistive Technology Assessments and Training; and Tennessee Business Enterprises Pre-Requisite Assessment and Instruction.

Support Services

- Residential Living
- Client Health Services
- Case Management Services
- Driver Education
- Psychiatric and Physician Services
- Recreation Therapy and Leisure-time Skills
- Remedial Education
- Job Seeking Skills Training
- Psychological Services
- Independent Life Skills Training

The Center operates at a program capacity of 174 individuals and provides services to approximately 1,200 Tennesseans with significant disabilities each year.

The Center is a member of the National Consortium of State Operated Comprehensive Rehabilitation Centers. An Advisory Council is utilized to provide valuable feedback used in guiding decision making in Center operations and program development. In addition, the Center conducts exit customer satisfaction surveys on individuals completing services, from each program of service provided, completes support services customer satisfaction surveys twice a year with clients receiving services, and conducts client family surveys, as well as a referring counselor needs assessment and satisfaction survey on an annual basis. Feedback obtained from these survey instruments is also used in guiding decisions about current and future support services and program services operations, as well as accessibility and physical plant operations.

- B. A network of 17 Tennessee Rehabilitation Centers is located across the state providing day services to eligible individuals with significant disabilities, seeking competitive employment. All community TRC facilities are accredited by the Commission of Accreditation of Rehabilitation Facilities (CARF) in programs of Comprehensive Vocational Evaluation and Employee Development Services. The TRCs are supported by a combination of appropriated local and rehabilitation funds.

Program Services

Vocational Evaluation

Comprehensive vocational evaluation services provide an individualized, timely and systematic process for identifying viable vocational options and developing employment goals and objectives.

An accredited comprehensive vocational evaluation service uses the following techniques to examine a wide range of employment alternatives:

- Assessment of functional/occupational performance in real or simulated environments
- Psychometric testing
- Preference and interest inventories
- Personality testing
- Extensive personal interviews
- Other appropriate evaluation tests depending on the individual
- Analysis of prior work experience and transferable skills

Employment Services

Services are based upon individual needs and can include comprehensive employment services or any individual component.

- a. Employee development services and/or job readiness instruction
- b. Community employment services (job development and placement).

Employee Development Services include:

- Work skills development through a facility workshop: including the use of contract work, job readiness assessment and training.
- Job Readiness Assessment and Instruction includes: Interview skills instruction, completing a job application, developing a resume, grooming and hygiene for the work place, self determination training, developing and using job-finding networks and resources.

Community Employment Services include:

- Job readiness assessment and instruction.
- Job development and placement into competitive employment through the identification of employment opportunities in the local job market.
- Development of realistic employment goals.
- Establishment of service plans to achieve employment outcomes. Identification of resources to achieve and maintain employment.
- Coordination of and referral to employment –related services.

TRC facilities conduct exit customer satisfaction surveys on individuals completing services from each program of service provided, completes a yearly survey with clients receiving services, referring counselors, contract providers, funding sources, employers, and other identified stakeholders. Feedback obtained from the surveys is used to improve program services.

2. Service Contracts:

- A. The Division plans to continue service contracts with the following community rehabilitation programs to ensure quality services statewide provided funding is available:

- Caring, Inc.
 - Vanderbilt University Return to Work Program
 - Technology Centers: East Tennessee Technology Access in Knoxville; Signal Centers; Technology Access Center of Middle Tennessee in Nashville; West Tennessee Special Technology Access Resource (STAR) Center in Jackson; and Mid South ACT in Memphis
 - Shelby Residential and Vocational Services
 - Volunteer Blind Industries, Inc.
 - Clovernook
 - Park Center
 - Tennessee School for the Deaf
 - Tennessee School for the Blind
 - University of Tennessee Rehabilitation Regional Continuing Education Program
 - University of Tennessee Center on Disability and Employment
 - Deaf Centers: Knoxville Area Community Center for the Deaf; Jackson Center for Independent Living; Frontier Health: Interpreting Service for the Deaf; Partnership for Families. Children and Adults
- B. The Division has two service contracts with Community Rehabilitation Programs serving visually impaired clients in the areas of evaluation, adjustment, activities of daily living, orientation and mobility, training, job development and employment.
3. Letters of Understanding
- A. The Division has the fiscal authority to establish Letters of Understanding statewide to purchase needed services for individuals with disabilities at the local level. These agreements are developed by the Regional Supervisors with community rehabilitation programs and with private vendors.
- B. The Division has 53 general Letters of Understanding with service providers throughout the state. The Division has 75 supported employment Letters of Understanding; 64 job placement Letters of Understanding, and 36 Letters of Understanding for trial work experiences.

Items one (1) through three (3) above are used to provide needed services such as but not limited to:

- Vocational Evaluation
- Personal and Work Adjustment
- Transportation
- Vocational Training
- Job Development
- Job Coaching
- Job Placement
- Rehabilitation Technology
- Orientation and Mobility
- Activities of Daily Living
- Trial Work Experiences

Attachment 4.8(b)(4) - Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

The Division continues to provide Supported Employment services to eligible clients with the most significant disabilities who have been determined to require on-going support services in order to maintain employment in Fiscal Year 2008.

It is the continued goal of the Division to provide quality Supported Employment services which are delivered in an effective, efficient and timely manner. Supported Employment services are provided through Letters of Understanding with Community Rehabilitation Providers (CRPs), and in cooperation with the Department of Finance & Administration, Division of Mental Retardation Services and the Department of Mental Health and Developmental Disabilities. The Community Rehabilitation Providers (CRPs) must assure that on-going support services will be provided prior to the implementation of Supported Employment services.

The number of Supported Employment Community Rehabilitation Providers has increased over the past two years to average 100 Supported Employment CRPs. While the number of CRPs may appear adequate to serve the Division's Supported Employment clients, there remains a shortage of CRPs able to provide Supported Employment services to persons involved in the state's de-institutionalization efforts. The Division will continue to enter into Supported Employment agreements with appropriate State agencies, as well as private and/or non-profit agencies which have the capabilities of providing quality service delivery to include on-going support services. In this regard, the Division will assertively seek those agencies that will provide Supported Employment services to persons being transitioned from institutional settings to the community and to work in competitive, integrated employment settings.

The Division will continue to seek Community Rehabilitation Providers to provide Supported Employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

Attachments to Title I State Plan**Attachment 4.10(b) - Procedures and Activities regarding the Establishment and Maintenance of a Comprehensive System of Personnel Development**

Tennessee Code Annotated, Title 8, Chapter 30 gives responsibility to the Commissioner of the State Department of Personnel to establish methods for handling personnel activities and transactions based on accepted principles of public personnel administration. In this regard, the Department of Personnel has developed a very comprehensive set of rules and regulations that govern personnel activities of all State agencies. Personnel activities regulated by the Department of Personnel include: (1) position classification (2) compensation (3) employment practices (4) job performance planning and evaluation (5) training (6) disciplinary action (7) attendance and leave (8) grievance (9) employee relations and (10) equal employment opportunity and affirmative action.

The "Classification Plan" established and maintained by the Commissioner of the Department of Personnel is a compilation of the officially authorized classes of positions for the State service. The classification plan contains the classification specification for each classification in the career service (all positions in State service subject to the civil service provisions of the Act).

Classification specifications for the career service include the following:

1. Classification Title
2. Summary or Definition
3. Distinguishing Features
4. Examples of Duties and Responsibilities
5. Minimum Qualifications
6. Examination Method

Position classification is the grouping of individual positions on the basis of similarity of duties, authority and responsibilities assigned, such that the same rates of pay and tests of fitness may be applied to all positions placed in the classification.

The Division adheres to the "Personnel Standards" as set forth by the State Department of Personnel in accordance with the State's Civil Service System (Act).

The Division currently has 651 authorized positions.

THE CLASSIFICATION "TITLE", "GRADE", AND "NUMBER OF POSITIONS" IN EACH CLASSIFICATION ARE AS FOLLOWS:

TITLE AND NUMBER OF POSITIONS ---- 345.70

<u>TITLE</u>	<u>ABBREVIATION</u>	<u>GRADE</u>	<u>NO.</u>
ACCOUNT TECHNICIAN 1	ACCTNG TEC 1	017	2
ADMINISTRATIVE ASSISTANT 1	ADMIN ASST 1	017	2
ADMINISTRATIVE SECRETARY	ADMIN SEC	016	7
ADMINISTRATIVE SERVICES ASSISTANT 2	ADMIN S AS 2	019	2
ADMINISTRATIVE SERVICES ASSISTANT 5	ADMIN S AS 5	027	1
BLIND SERVICES REHAB CENTER MANAGER	BLIND RC MGR	024	1
BUILDING MAINTENANCE WORKER 2	BLDG M WKR 2	016	5
BUILDING MAINTENANCE WORKER 3	BLDG M WKR 3	018	1
BUSINESS ENTERPRISES CONSULTANT 2	BUS ENT CN 2	021	5
BUSINESS ENTERPRISES SPECIALIST	BUS ENT SPEC	023	7
BUSINESS ENTERPRISES SUPERVISOR	BUS ENT SPV	027	3
CLERK 1	CLERK 1	006	1
CUSTODIAL WORKER 2	CUST WKR 2	011	6
CUSTODIAL WORKER SUPERVISOR 1	CUST WKR S 1	014	1
FACILITIES MANAGER 1	FAC MGR 1	021	1
FIELD SUPERVISOR 1	FIELD SUPV 1	025	33
FIELD SUPERVISOR 2	FIELD SUPV 2	027	4
HEARING IMPAIRED DIRECTOR	HEAR I DIR	026	1
HUMAN SERVICES PROGRAM COORDINATOR	HS PRG CRD	026	17
HUMAN SERVICES PROGRAM DIRECTOR 1	HS PGR DIR 1	030	3
HUMAN SERVICES PROGRAM DIRECTOR 2	HS PGR DIR 2	032	4
HUMAN SERVICES PROGRAM DIRECTOR 3	HS PGR DIR 3	033	1
HUMAN SERVICES PROGRAM MANAGER	HS PRG MGR	028	7
HUMAN SERVICES PROGRAM SPECIALIST	HS PRG SPC	025	3
HUMAN SERVICES PROGRAM SUPERVISOR	HS PRG SPV	029	9
INFORMATION RESOURCE SUPPORT SPECIALIST 5	IN RES SP 5	900	1
LICENSED PRACTICAL NURSE 2	LPN 2	016	11
LICENSED PRACTICAL NURSE 3	LPN 3	018	1
OCCUPATIONAL THERAPIST ASSISTANT (CERTIFIED)	OCC T AST C	900	2
OFFICE SUPERVISOR 1	OFF SUPV 1	016	10
ORIENTATION AND MOBILITY SPECIALIST	ORNTN MOB SP	025	1
PHYSICAL THERAPY TECHNICIAN	PHYS T TECH	015	1
PHYSICAL THERAPIST	PHYS THERS	900	1
PSYCHOLOGIST	PSYO	900	2
PSYCHOLOGICAL EXAMINER 1	PSYO EX 1	026	2
RECREATION THERAPIST 2	REC THERS 2	021	6
RECREATION THERAPIST 3	REC THERS 3	022	1
REGISTERED NURSE 2	RN 2	900	1
REGISTERED NURSE 3	RN 3	900	1
REGISTERED NURSE 4	RN 4	900	1
REHABILITATION ASSISTANT	REHAB ASST	014	49
REHABILITATION ASSISTANT SUPERINTENDENT	REHAB ASUPT	029	1
REHABILITATION BEHAVIORAL INSTRUCTOR 2	REHAB B IN 2	021	8

REHABILITATION INSTRUCTOR	REHAB INST	024	1
REHABILITATION INSTRUCTOR – BLIND	REHAB INST B	021	19
REHABILITATION SUPERINTENDENT	REHAB SUPT	032	1
REHABILITATION TRAINING CENTER MANAGER	REHAB TC M	025	17
SECRETARY	SECRETARY	014	105
SECURITY CHIEF	SECUR CHIEF	020	1

TITLE AND NUMBER OF POSITIONS ---- 345.70

<u>TITLE</u>	<u>ABBREVIATION</u>	<u>GRADE</u>	<u>NO.</u>
SECURITY GUARD 1	SECUR GRD 1	014	3
VOCATIONAL INSTRUCTOR PER SPECIALTY	VOC INS SPEC	900	9
VOCATIONAL REHABILITATION COUNSELOR 2	VOC RHB CO 2	021	<u>266</u>
TOTAL			649

TITLE AND NUMBER OF POSITIONS ---- 345.01

<u>TITLE</u>	<u>ABBREVIATION</u>	<u>GRADE</u>	<u>NO.</u>
ASSISTANT COMMISSIONER 2	ACOMM 2	040	1
ADMINISTRATIVE SERVICES ASSISTANT 2	ASA 2	019	<u>1</u>
TOTAL			2

The Division received 9,463 new applications for services in Fiscal Year 2006 and provided services to 41,524 individuals.

The Division's staffing level was adequate to meet the demand for services this past year (Fiscal Year 2006). The Division's staffing level remains adequate to meet the demand for services in Fiscal Year 2008. The Division currently experiences a staff attrition rate of approximately fourteen percent (14%). However, the Division continues to be very successful in filling vacancies in a very timely manner.

The Division continues to receive and maintain monthly position classification/staffing reports prepared by the State Department of Personnel. The reports detail each position by classification code, filled/vacant, salary, and other pertinent information. The reports are used to project the need for future staff positions along with an analysis of years of service, projected retirement dates, etc. The Division also receives/maintains reports/data in order to determine minority staff representation and Affirmation Action planning.

The Division's Director of Staff Development continues to meet quarterly with the Director of the Rehabilitation Counselor Education Program at the University of Tennessee and the Director of the Rehabilitation Counselor Education Program at the University of Memphis for the purpose of planning and sharing information relative to "personnel development" activities.

These meetings provide the mechanism for gathering information on an annual basis relative to the "number of students enrolled" in their respective Rehabilitation Counselor Education Programs, as well as the "number who graduated" from their programs during the past year.

The University of Tennessee currently has 6 students enrolled in their Rehabilitation Counselor Education Program and the number who graduated from their program this past year was 7. There was a 14% minority enrollment and a 29% enrollment of persons with disabilities.

The University of Memphis currently has 10 students enrolled in their Rehabilitation Counselor Education Program and the number who graduated from their program this past year was 6. There was a 17% minority enrollment and a 17% enrollment of persons with disabilities.

The Division continues its recruitment policy for staff from minority backgrounds and for staff who are individuals with disabilities. Supervisors and Counselors continue their recruitment efforts from historically black colleges and universities and institutions of higher education noted for a high student population of individuals with disabilities. Supervisors and Counselors continue to visit high schools and participate in Job Fairs in an effort to acquaint students with the Rehabilitation Counselor Education programs, especially the programs at the University of Tennessee and the University of Memphis.

Counselors continue to counsel and encourage clients, especially clients from minority backgrounds, who are interested in pursuing post secondary training to consider vocational rehabilitation counseling as a profession. The Division's Director of Staff Development continues to work closely with University Rehabilitation Counselor Education program administrators to stress the need for their recruitment of applicants from minority backgrounds and individuals with disabilities into their training programs.

Since there is no State-approved or recognized certification, licensing or registration requirements for Vocational Rehabilitation Counselors in Tennessee, the Division bases its personnel standards for Counselors on the degree required for the national Certified Rehabilitation Counselor requirement—a Master's degree in rehabilitation counseling or a closely related field, as defined by the Commission on Rehabilitation Counselor Certification (CRCC).

The Division has 266 Vocational Rehabilitation Counselor positions with 250 filled as of 3/31/07. Of the 250 counselors, fifty nine (59) have a Master's Degree in Rehabilitation Counseling (23.6%); twelve (12) have a Master's Degree in a related field that meets the National CRC requirement (4.8%); thirty-two (32) have a Master's Degree that does not meet the educational requirements for the National Certified Rehabilitation Counselor requirement (12.8%); twenty three (23) are currently enrolled in a Masters in Rehabilitation Counseling program (9.2%) and 124 do not possess a Master's Degree or their degree has not been evaluated by the CRCC as of this date. The Division has promoted a number of counselors to supervisory level positions with nineteen (19) supervisors meeting the state's CSPD requirements and eleven (11) supervisors currently holding the CRC credential. There are a total of forty-four (44) CRCs employed by the agency at this time, an increase from 28 last year.

The following steps have been initiated to move the Division forward to meet the “Qualified” personnel requirements within the meaning of the Act (101) (a)(7)(B), and its implementing regulations (34 CFR 361.18 (c)).

New Hires: To the extent possible, all new hires into the Vocational Rehabilitation Counselor classification are individuals who possess a Master’s Degree in Rehabilitation Counseling or closely related field. Tennessee continues to the face barrier of a limited pool of qualified applicants.

The Division has improved the pay scale that previously affected our ability to recruit and retain “qualified” personnel. The starting salary for a Master’s Degree level counselor when we started our CSPD initiative was \$20,016. During Fiscal Year 1999, the Division was successful in getting the starting salary for new hires with a Master’s Degree in Rehabilitation Counseling elevated to \$25,440. In the following years the salary has been increased to the current rate of \$31,848 (effective July 1, 2006). This increase from \$20,016 to \$31,848 in nine years has substantially improved our ability to recruit “qualified” Vocational Rehabilitation Counselors.

While it is the intention of the Division to hire only counselors who possess the degree required for the national Certified Rehabilitation Counselor requirement – a Master’s Degree in Rehabilitation counseling or a closely related field, it has not been possible to do so in every situation due to the limited pool of qualified applicants. New Staff hired without the Masters degree are informed that they are expected to pursue opportunities for a Masters in Rehabilitation Counseling and/or meet the CRC academic requirement. However, the Department of Personnel prohibits the Division from making this a requirement for job retention.

Current Staff: Several initiatives are being utilized to assist current Vocational Rehabilitation Counselors to obtain the educational requirements necessary to meet the national Certified Rehabilitation Counselor requirement. Vocational Rehabilitation Counselors are being encouraged to take advantage of any training that will enable them to meet the CRC requirements.

In Tennessee, there are two universities that have Council on Rehabilitation Education (CORE) certified programs providing a Master’s degree in Rehabilitation Counseling. One is in the eastern part of the State at the University of Tennessee at Knoxville; and the other is at the University of Memphis located in the western part of the State. Due to current budget constraints, degree programs are not being added at most universities. Should this situation change, efforts will be made to initiate discussions with Tennessee State University, a historically black university, for the purpose of developing and/or partnering with other educational entities to provide a Master’s Degree Program for easy access to individuals in Middle Tennessee.

The Division continues to work with the University of Tennessee at Knoxville and the University of Memphis to develop non-traditional ways of delivering “creditable hours” leading to a Master’s Degree in Rehabilitation counseling, such as “distance learning” formats.

Currently the Division has ten (10) Vocational Rehabilitation Counselors enrolled in the Rehabilitation Services Administration Grant sponsored Master’s Degree Program at Auburn University. This is being accomplished via the Internet and one week sessions on campus each semester.

The Division currently has three (3) Vocational Rehabilitation Counselors enrolled in the Rehabilitation Services Administration Grant sponsored Master's Degree Program at San Diego State University, Georgia State University, and North Texas State University (Consortium). This is being accomplished via the Internet.

The Division also has ten (10) Vocational Rehabilitation Counselors enrolled in the Rehabilitation Services Administration Grant sponsored Master's Degree Program at the University of Kentucky.

A total of three (3) state employees have graduated from graduate programs this year. Two of the three graduates are minorities (67%). Of the twenty-three (23) Vocational Rehabilitation Counselors currently enrolled in graduate distance learning programs, seven (7) are minorities (30%) and one (1) participant has a disability (4%).

Currently incentives for staff to participate in a Master's Degree Program include financial assistance with tuition, books, fees, and minimal educational leave. Funding for a pay incentive based upon successful completion of a Master's Degree program was approved in January 2005 for graduates and has been requested for each successive graduate.

Funding to support these activities continues to be pursued through a budget improvement request to our current State budget; reallocation of traditional in-service training monies, as well as utilization of funding received through our Social Security Administration (SSA) Reimbursement Program. Also, the Division continues to work closely with any College or University to help secure any "grant" funding made available to help the Division meet its Comprehensive System of Personnel Development (CSPD) initiatives.

The State Department of Personnel has guidelines in place for compensating employees who obtain a nationally recognized professional certification during their employment with the State.

The two main objectives outlined in their policy statement are:

1. To recognize employees who choose to enhance their competencies and service to the state through acquisition of knowledge and skills relevant to the performance of their major professional duties and responsibilities.
2. To provide an incentive to employees who successfully demonstrate acquisition of such competencies by attaining certification from a nationally recognized professional organization.

The intent is to provide both a means of encouraging employees to attain professional competencies and to provide an incentive for these employees to remain in State service. Funding for this incentive program continues to be very limited. However, the Division is aggressively seeking adequate funding for this incentive.

The Division expects to retain qualified rehabilitation professionals who are on the staff by providing support services which will make their jobs easier. Counselors have computer capability and receive training in a variety of programs including Internet utilization to access rehabilitation materials. Numerous films, books and other printed materials are available to all offices within the Division. Counselors are encouraged to request copies of any materials of a professional nature which would assist them in their jobs.

The Division continues its efforts for succession planning with activities currently directed towards development of a comprehensive succession planning program. The Division, through Administrative and Management staff continues to study where the Division will be five years from this date, i.e., as far as the strengths and weaknesses are concerned with direct consideration of the personnel and leadership of the Division. It is the plan of the Division to insure a cadre of supervisory and managerial staff for future years. This is being accomplished on a year-to-year basis through extensive in-service and out-service training programs offered to our new supervisory staff. Several of the counselors who have completed their Masters degrees have moved into supervisory roles within the Division.

New supervisors continue to participate in the Georgia State University New Supervisory Training Program. Staff throughout the Division participated in Personnel Department Training Courses, many of them designed for supervisory and administrative staff with an objective of allowing personnel to move into leadership positions. The State Department of Personnel has developed and implemented a Leadership Development Initiative consisting of a number of core management skill training courses. All supervisors and managers are required to participate.

The Division has collaborated with the Georgia State University Leadership Development Program to develop and implement a values driven management system to promote client-centered service delivery. Management, regional and front line supervisors are participating in extensive training sessions to develop strategies for statewide implementation of the values driven client service delivery system.

Policy of the Department of Human Services and the Division of Rehabilitation Services requires an annual "training needs assessment" to determine training needs of staff. Our training needs assessment is completed through the following methods:

1. Statewide Training Needs Assessment Survey
2. Individual Staff Training Plans
3. State Rehabilitation Management and Administrative Staff Input
4. Regional Rehabilitation Continuing Education Program Studies and Suggestions
5. State Personnel Department Training Division Mandates
6. Rehabilitation Services Administration Guidelines
7. Recommendations of the State Rehabilitation Council and the Statewide Independent Living Council.
8. Counselor Competency Exam

Program case reviews conducted by the Division's Program Evaluation and Quality Assurance Unit are also utilized to identify strengths and deficiencies among staff and related training needs.

The 2008 training needs are as follows:

1. Spanish in the Workplace
2. Computer Training
3. Leadership Skills
4. Cultural Diversity
5. Job Placement
6. Behavior Management
7. Psychiatric Aspects of Disability
8. Assistive Technology
9. Job Development
10. Serving Clients with Traumatic Brain Injuries

The Division received a quality award through the RSA In-Service Grant program to fund training in Spanish language skills and cultural awareness. In collaboration with a local university, the development of a statewide Spanish in the Workplace training program is underway. Cultural diversity training will also be provided statewide in the upcoming year.

Other on-going staff development initiatives include:

1. The acquisition and dissemination of significant knowledge obtained from research and other sources
2. Rehabilitation Technology Utilization
3. Americans with Disabilities Act (ADA) and Section 504 Issues
4. Training related to Individuals with Disabilities Education Improvement Act (IDEA)
5. Training for Community Rehabilitation Providers.

The Division continues to conduct regional or statewide training activities with the above issues as agenda items. Specific issues relative to the Rehabilitation Act Amendments of 1998 that continue to receive emphasis are:

1. Resiliency Training
2. Informed Choice
3. The Individualized Plan for Employment
4. Certification of Eligibility
5. Trial Work Experiences
6. Annual Reviews of Extended Employment
7. Services to culturally diverse populations

The Division continues to provide on-going training and technical assistance regarding the Americans with Disabilities Act to staff and the general public, including business and industry.

The Division continues to contract with technology centers across the state for training and technical assistance in "Rehabilitation Technology" services. Rehabilitation Technology contracts are in place with the East Tennessee Technology Access Center (Knoxville), Technology Access Center of Middle Tennessee (Nashville), West Tennessee STAR Center (Jackson), Signal Center (Chattanooga), and Mid-South Access Center for Technology (Memphis).

The Division has policies and procedures to ensure that it includes among its personnel or has readily available the services of (1) Individuals able to communicate in the native languages of applicants and eligible individuals who have limited English speaking ability through the Open Communications International services; and (2) Individuals able to communicate with applicants or eligible individuals in appropriate modes of communication. The Division's policy addresses the process for accessing the individual communication needs of each applicant or eligible individual it serves.

The Division continues to recognize its responsibility for employing or obtaining the services of sign-language interpreters, which fall within the definition of "appropriate modes of communication" in (Sec. 361.5(b) (5)), to the extent necessary to meet the communication needs of individuals who are deaf or deaf-blind.

The Division's policy addresses the (1) significance of such services, (2) the selection of service providers, (3) the scheduling and payment for services, and (4) an evaluation process of services.

Over the phone translation services are available through Open Communications International. All regions have received orientation packages to be used to train all of their staff in the use of this service.

In regard to staff evaluation, the Department of Personnel has a very comprehensive "job performance planning and evaluation" system utilized by all State agencies. The purpose of the job performance and evaluation system is to promote employee development, enhance employee productivity, serve as a basis for sound personnel decisions, and provide a record of the performance of major job duties and responsibilities of employees.

The two major goals of the job performance planning and evaluation system are:

1. To maximize the performance and job satisfaction of individual employees by encouraging and reinforcing communication between supervisors and employees.
2. To provide a more objective basis for personnel decisions.

Each employee continues to have a formal written evaluation conducted in accordance with the above evaluation process annually.

Supervisors/managers with the responsible for conducting and/or reviewing the performance evaluation of employees are given formalized training in the job performance planning and evaluation system.

A critical step in the evaluation process is the initial discussion (job plan) where major job duties and responsibilities are identified. The Division has developed formalized "job catalogs" to assist supervisors in the defining of major job duties and responsibilities of employee classifications utilized by the Division (i.e. vocational rehabilitation counselor, secretary, etc).

The process of ensuring that the job duties and responsibilities that are defined on the job plan are consistent with tasks that facilitate the serving of individuals with disabilities, including those with the most significant disabilities, insures that the system in no way impedes the purpose of Title I.

By having a formalized evaluation system that ensures ongoing communications between supervisors and employees also serves as a mechanism for ensuring that the system in no way impedes the purpose of Title I.

By having a clearly defined evaluation system that gives praise and reinforcement for good performance, as well as gives constructive feedback and guidance on responsibilities that employees are having difficulty with, enhances staff performance and again serves as a mechanism for ensuring the system in no way impedes the purpose of Title I.

The Individuals with Disabilities Education Improvement Act (IDEA 2004) provides renewed emphasis toward the planning of service delivery and collaboration of the various divisions and programs designated to serve children and youth with disabilities.

The Division has an interagency agreement with the Division of Special Education, State Department of Education providing administrative support for a coordinated, collaborative effort of service delivery. The Blind and Visually Impaired Services unit continues an agreement with the Tennessee School for the Blind. Networking of the two divisions relative to “transitioning” services has provided a means for coordinating and sharing information relative to “personnel development” under the Individuals with Disabilities Education Improvement Act. There is ongoing communication between the two divisions and each division has responsibility for providing input into personnel development activities.

An interagency agreement was developed to fulfill the requirements of the Individuals with Disabilities Education Improvement Act (IDEA). The purpose of this agreement is to identify and define the financial responsibility of each state agency for providing services under IDEA and to facilitate the provision and coordination of services for all children with disabilities. The following state agencies are participating in this agreement: Department of Education (Division of Special Education; LEAs; TEIS; Department of Children's Services; Department of Finance & Administration (TennCare; Division of Mental Retardation Services); Department of Health; Department of Human Services/Division of Rehabilitation Services; Department of Mental Health & Developmental Disabilities.

The Division continues to recognize the value of the involvement of the Division's State Rehabilitation Council in its personnel development activities. It is the policy of the Division to give the Council ongoing review and input on the development of issues associated with the Division's Comprehensive System of Personnel Development. As stated in attachment 4.2 (c), the Council continues to be involved with CSPD issues associated with recruitment and retention of staff, counselor salaries and pay incentives for successful attainment of a Masters Degree in Rehabilitation, and training for existing staff to obtain their Masters Degree.

Attachments to Title I State Plan**Attachment 4.11 (a) - Results of the Comprehensive Statewide Assessment of the Needs of People with Disabilities and the Need to Establish, Develop, or Improve Community Rehabilitation Programs**

The Tennessee Division of Rehabilitation Services (TDRS), in collaboration with the State Rehabilitation Council (SRC), completed a comprehensive assessment of the vocational rehabilitation needs of Tennesseans with disabilities in the spring of 2006 and is conducting needs assessments on a three-year cycle. As required in 34 CFR.29, the information obtained from a number of sources was assessed and analyzed to determine:

The needs of individuals with disabilities, particularly the vocational rehabilitation service needs of:

- (A) Individuals with the most significant disabilities, including those who need supported employment services;
- (B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program;
- (C) Individuals with disabilities served through other components of the statewide workforce investment system and personnel assisting those individuals through the components of the system; and

The need to establish, develop or improve community rehabilitation programs (CRPs) within the state of Tennessee.

METHODOLOGY

Survey of clients, staff, service providers and client advocates: The Tennessee Division of Rehabilitation Services (TDRS) conducted its comprehensive needs assessment in collaboration with the State Rehabilitation Council (SRC). A formal survey was conducted by the Sparks Bureau of Business and Economic Research/Center for Manpower Studies at the University of Memphis. Survey participants included vocational rehabilitation clients, staff, Vocational Rehabilitation service providers, and advocates for individuals with disabilities. Trained survey interviewers administered the client survey by telephone, while the other three groups were surveyed through an anonymous web-based process. The four surveys shared several like items but also differed based on distinct issues for each group.

The closed case client sample came from cases closed between September 2005 and December 2005, including successful outcome closures (Status 26), closures without a successful outcome after services were initiated (Status 28), and closures of Blind and Visually Impaired clients. The active client sample was comprised of clients who were active in the TDRS program between September 2005 and December 2005. Approximately 2,331 individuals were contacted, and 1,140 of those individuals completed the survey.

Additionally, the agency contracts with the Sparks Bureau of Business and Economic Research at the University of Memphis to conduct an on-going customer satisfaction survey of individuals with disabilities who were served by the TDRS. The Sparks Bureau provides the agency with semi-annual and annual reports. Approximately 2,900 TDRS

clients are surveyed each year to determine the level of satisfaction with services and to determine any unmet rehabilitation needs.

Targeted Survey of Regional Management Staff: Regional Supervisors across the state were surveyed on regional and local needs for additional Community Rehabilitation Programs (CRPs); improved transportation for assessment, training, and employment; and unserved and underserved populations.

State Rehabilitation Council (SRC): Tennessee's State Rehabilitation Council meets quarterly with TDRS management staff. The SRC provides important input on the rehabilitation needs of individuals with disabilities in Tennessee and collaborates on planning for addressing those needs.

Public Hearings: TDRS conducts annual public hearings to receive input about the rehabilitation needs of people with disabilities. These hearings are held in the major Tennessee cities of Johnson City, Knoxville, Chattanooga, Nashville, Jackson and Memphis. These hearings give clients, including individuals with most significant disabilities, unserved and underserved populations, and minorities across the state a chance to express rehabilitation needs and concerns. Agency leadership and staff attend the hearings to collect input and to address specific concerns.

Boards: TDRS staff participate in a number of committees and boards which provide the opportunity for input from member about the rehabilitation needs of Tennesseans with disabilities. These include the Statewide Independent Living Council, Tennessee Council for the Deaf and Hard of Hearing, the Tennessee Council for Developmental Disabilities, the Mental Health Policy and Planning Council, the Tennessee Statewide Workforce Investment Board, Traumatic Brain Injury Advisory Board, the Developmental Disabilities Task Force, and the Tennessee Technology Access Project Statewide Advisory Council.

TRC State Advisory Board: TDRS operates 17 community Tennessee Rehabilitation Centers (TRCs) which provide services to clients, especially those with the most significant disabilities. The State Advisory Board, as well as local advisory boards, provides guidance to the TRCs on rehabilitation services and improvement of those services.

Workforce Investment System: TDRS is an active partner in Tennessee's Workforce Investment System. The agency has full time counselors stationed in all comprehensive Career Centers and a few of the satellite Career Centers. The remaining satellite Career Centers are served by counselors on an itinerant basis. Counselors serving Career Centers provide an important resource to other staff members at the centers to assist them in the provision of services to persons with disabilities. Stationing counselors at the Career Centers allows TDRS to gather data and input on the needs of those persons with disabilities who visit the Career Centers. TDRS maintains a working relationship with the Local Workforce Investment Areas through representation on local boards and operating consortiums. A State Office staff member maintains a working relationship with the Workforce Investment System at the State level for planning and resource-sharing activities.

Consumer Groups: TDRS staff is actively involved in various consumer group organizations, including state and national chapters of the National Federation of the Blind, the American Council for the Blind, and the Tennessee Council for the Deaf and Hard of Hearing. Agency staff members also participate in consumer groups dealing with various disabilities including spinal cord injury, mental health, and drug and alcohol abuse.

Community Rehabilitation Programs (CRPs): The agency operates 17 community rehabilitation centers across the state of Tennessee. TRC staff gather information about the needs of individuals with disabilities, especially those with the most significant disabilities. The agency also has an ongoing, cooperative and effective relationship with a network of private and non-profit CRPs throughout Tennessee. TDRS has counselors assigned to each of these CRPs to maintain contact with clients and to seek referrals of potential clients. Through this regular contact with the CRPs, TDRS has the opportunity to learn about additional needs of individuals with disabilities who are participants in the community rehabilitation programs.

State of Tennessee, Division of Rehabilitation Services Web Site: TDRS maintains a web site that provides information about programs and services and that also allows site visitors to request information or provide input about needs and concerns.

ASSESSMENT RESULTS

The resources cited above provided the input used by TDRS in FY2006 to complete a comprehensive assessment of the rehabilitation needs, as well as other related needs, of individuals with disabilities in Tennessee.

Rehabilitation Needs of Individuals with the Most Significant Disabilities

The following needs were identified through the Sparks Bureau survey by individuals with the most significant disabilities as having the biggest impact on rehabilitation success:

1. **Education and Training:** Education and vocational training were identified as the most important vocational need of individuals with significant and most significant disabilities by 63% of the survey participants. 64.7% indicated that this need is being met through VR services, while 12.4% reported that these services were "somewhat provided".
2. **Employment opportunities:** Increased employment opportunities, including self-employment, job development, and job training, were cited as the primary vocational need by 60.8% of the respondents. There is a need for increased supported employment services, especially in the rural areas, to provide additional employment opportunities for individuals with the most significant disabilities.
3. **Information:** In order to be successful, respondents with most significant disabilities identified a need for information regarding resources, services and benefits during the time they are involved with the VR program. In addition, the participants wanted to know how their medical benefits would be affected if they accept employment.
4. **Support Services:** The program needs assessment identified the need for support, both ongoing and follow up, in addition to outreach and advocacy groups. The survey also identified the need for transportation services and for medical care, health insurance, and medicines.
5. **Counseling and guidance:** 48% of individuals with most significant disabilities who responded to the survey stated that in order for them to be successful in their program they needed counseling and guidance. 65.2% of the respondents felt this need was adequately met.

Rehabilitation Needs of Individuals who are Minorities

According to the 2000 Census, Tennessee has an African-American population comprising almost 17% of the population. The Hispanic population in Tennessee makes up 2.2% of the population. In 5% of the homes in Tennessee, a language other than English is spoken in the home. TDRS case loads had a strong representation of minorities, with 27.5% of the total caseload in 2005/2006 being African-American and 0.9% being Hispanic.

The most important vocational needs of all minorities were identified through the formal survey as:

1. Employment: Respondents to the survey identified the need for increased employment opportunities in occupations with career advancement and with salaries above minimum wage. Information obtained from the State Department of Education indicates that minorities in Tennessee have a higher high school dropout rate than non-minorities. Survey respondents identified the need for additional education and skills training services for minorities with disabilities to assist them in succeeding in the labor market.
2. Education and vocational training
3. Counseling and guidance
4. Information regarding resources, services and benefits
5. Support services, including outreach and advocacy groups: Minority groups surveyed identified a need for additional support services including medical care and health insurance; lack of support groups; transportation; and child care services.

In addition, TDRS staff has identified an increasing need for availability of foreign language translating services. With a growing population of non-English speaking people with disabilities, there is an increasing need for translating services to assist non-English speaking minorities, especially those who speak only Spanish, in accessing rehabilitation services and employment opportunities. While the Agency is able to meet those needs through present resources, we are aware of the need to plan for future needs.

Services to Individuals Who Have Been Unserved or Underserved

TDRS staff and client advocate groups have identified several populations in Tennessee which have either been unserved or underserved.

1. There is an increasing number of individuals living in Tennessee who speak only Spanish, and there are also large populations of immigrants from Africa, Asia, and the Middle East. Those with significant disabilities are in need of training, translation services, and improved employment opportunities.
2. TDRS has been operating under an Order of Selection since August 1, 2001; there are approximately 9,930 clients in closed priority categories who are unserved at this time.
3. Deaf-Blind Individuals: Many CRPs, especially in rural areas, lack the resources to provide services to deaf-blind individuals. It is very difficult to find sign

language interpreters skilled in working with deaf-blind individuals, and the problem is especially acute in rural areas.

Individuals with Disabilities Served through the Statewide Workforce Investment (WIA) System TDRS is an active partner in the state's Workforce Investment System. Based upon input from agency personnel who participate on local Workforce boards and from TDRS counselors who serve the Career Centers, individuals with disabilities served through other components of the workforce system require the following services and accommodations from the Career Centers:

- Continued efforts to meet program accessibility and accommodation needs
- Understanding of referral processes and eligibility for program services
- Navigation through the Career Center programs
- Collaboration with and feedback from program case managers
- Disability awareness and etiquette training
- Effective methods of serving individuals with disabilities.

Assessment of the Need to Establish, Develop, or Improve Community Rehabilitation Programs in the State

The statewide program needs assessment survey conducted by TDRS identified the following needs in this area:

- Cross-training and improved communication and interaction among agency staff, vocational rehabilitation service providers and advocates for individuals with disabilities;
- Additional CRPs in specific areas of the state for supported employment services. While the number of CRPs may appear adequate to serve the Division's supported employment clients, there remains a shortage of CRPs able to provide supported employment services to persons involved in the de-institutionalization efforts;
- Transportation services for clients to attend the CRP programs in many areas;
- Some CRPs indicated a need for more training in employer accommodation guidelines;
- Additional job coaches for both supported employment and non-supported employment services;
- Additional work adjustment programs in areas that are not served by the Community TRCs;
- An increase in the number of staff able to communicate with consumers in Spanish and/or other languages and further development of the resources to provide translating services, as needed, at the local level.

Attachments to Title I State Plan

Attachment 4.11(b) - Annual Estimates

1. Tennessee's population based on Census 2000 data is 5,689,283. Tennessee's population 18 years and over is 4,290,762.

Research data indicates that:

- A. Approximately 20% of Americans have a disability.
- B. Approximately 12% have a significant disability.
- C. Approximately 18.7% of the population age 15 to 64 have a disability.
- D. Approximately 10.5% of the population age 18 to 64 have a work limitation.
- E. Approximately 10.2% of the working age population age 16 to 64 have a disability that prevents or limits work.

Research data further indicates that the highest percentages of individuals with work disabilities who are not working are in the South, with Tennessee being one of the highest. It is estimated that Tennessee's population between the ages of 16 and 64 is approximately 3.7 million and that 582,000 (15.7%) have a significant disability and may be eligible for services.

2. In Fiscal Year 2006, the Division of Rehabilitation Services provided services to 41,524 individuals. Of this number 37,787 met the eligibility criteria of the program. A total of 9,911 were individuals who met the eligibility criteria, but were not in an open priority category as of September 30, 2006. It is projected that 34,000 individuals will receive services and that 23,100 individuals will meet the eligibility criteria of the program and receive services in accordance with the Order of Selection during Fiscal Year 2008.

It is estimated that the number of individuals to be served during Fiscal Year 2008 under each priority category within our Order of Selection will be:

PRIORITY CATEGORY	#1	<u>20,500*</u>	* This number includes an estimated 3,800 individuals eligible for Title VI, Part B Supported Employment
PRIORITY CATEGORY	#2	<u>2,000</u>	
PRIORITY CATEGORY	#3	<u>500</u>	
PRIORITY CATEGORY	#4	<u>100</u>	
		23,100	TOTAL

3. It is estimated that the cost of services for the projected 34,000 individuals will be approximately \$28,232,500 and that the service cost for each priority category within the Order of Selection for the 23,100 individuals served will be:

PRIORITY CATEGORY	#1	<u>\$25,112,500*</u>	* This number includes <u>3.3 million</u> Title I, Part B funds plus our Title VI, Part B funds to serve individuals eligible for Supported Employment
PRIORITY CATEGORY	#2	<u>\$ 1,900,000</u>	
PRIORITY CATEGORY	#3	<u>\$ 350,000</u>	
PRIORITY CATEGORY	#4	<u>\$ 70,000</u>	
		\$27,432,500	TOTAL

Attachments to Title I State Plan**Attachment 4.11(c)(1) - State's Goals and Priorities**

The goals and priorities of the Division of Rehabilitation Services for Fiscal Year 2008, as developed and agreed to by the Division of Rehabilitation Services staff and the State Rehabilitation Council, are:

1. Streamline focus of the Division of Rehabilitation Services for client-centered, effective, successful service.

- a. Provide services to approximately **34,000** individuals. Services include information and referral for individuals on the waiting list in a closed priority category. As of 3/31/2007, there were **9,930** eligible individuals on the waiting list in closed priority categories.
- b. Achieve successful outcomes for at least **2,906** individuals with disabilities. Successful outcome means suitable employment that continues for a minimum of 90 days.
- c. At least **92%** of individuals served and closed with successful employment outcomes will be individuals with significant disabilities.
- d. The success rate for individuals determined eligible and receiving services will be at least **70%**. Success rate is determined by the number of Status 26 (Rehabilitated Cases) divided by the number of Status 26 plus the number of Status 28 (Non-Rehabilitated Cases).
- e. Achieve a **96% or higher satisfaction rating** for the Vocational Rehabilitation Program as reported by the consumer satisfaction survey program for successful outcome closures.
- f. Expand the client intake process to facilitate more counseling to include considerations such as healthcare, impact on SSA benefits, and economic needs through measures such as an improved application document. Counseling provided and referrals to other resources will be noted within the case file notes.
- g. Increase employment opportunities for clients through the following services, measured by an increased number of clients entering employment after receiving those services:
 - i. Supported employment
 - ii. Job coaches
 - iii. Appropriate self employment

2. Develop staff motivation and skills to deliver client-centered counseling.

- a. Continue the implementation of the Division's Comprehensive System of Personnel Development (CSPD) initiative by developing a strategy for recruiting vocational rehabilitation counselors who already meet the criteria for qualified rehabilitation counselor.
- b. Increase training for counselors, evaluators and related voc rehab staff on how effective rehabilitation technology options lead to successful employment outcomes.

3. Reach out to stakeholders to build resources, reputation and results.

- a. Develop a marketing/outreach plan that:
 - i. targets and reaches unserved or underserved populations, such as Spanish speaking clients and clients with TBI, autism, deaf-blindness, and mental illness;
 - ii. targets individuals with disabilities who meet our Order of Selection open Priority Category 1 classification;
 - iii. targets SSA beneficiaries seeking employment; and
 - iv. clearly conveys the employment purpose of our services.
- b. Increase partnerships with transportation providers to expand options for clients to participate in vocational rehabilitation and to secure sustainable transportation for employment.
- c. Improve communication and partnership among DRS and other state agencies, community resource providers, career centers, employers and disability service providers.
- d. Provide greater technical assistance to workforce investment (career centers).

Attachments to Title I State Plan**Attachment 4.11(c)(3) - Order of Selection**

On August 1, 2001, the Division of Rehabilitation Services implemented an Order of Selection due to funding limitations that would not allow the Division to provide services to all eligible individuals who apply. The Division will continue to operate under an Order of Selection during Fiscal Year 2008. The Order of Selection has four priority categories and only Priority Category 1 (eligible individuals who have the most significant disabilities) remains open. With limited funds and resources the Division of Rehabilitation Services has not been able to provide services to all eligible individuals who have applied since August 2001. Therefore, execution of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, was and is still warranted. The Order of Selection serves as a means of determining which eligible individuals will be served.

Services and expenditures are monitored on a continuous basis, allowing the Division to manage available funds to assure services are continued for cases placed in an open priority category and receiving services under an Individualized Plan for Employment (IPE). Additionally, adequate funds will continue to be conserved to provide assessment services for all applicants expected to apply throughout the year to determine eligibility and to provide services for those eligible individuals placed in an open priority category within the Order of Selection.

If the Division can not continue to serve all new Priority Category 1 cases (eligible individuals who have the most significant disabilities) who apply, then services will be provided to new PC 1 cases based on the date of application for services. Likewise, should the Division have funding resources to open a closed Priority Category, but not be able to provide services to all cases currently awaiting services in that category; then services will be provided based on the date of application for services. The Division's Order of Selection is developed in keeping with 34 CFR 361.36 of the final regulations.

The Order of Selection priority categories, justification, outcome and service goals, and time frames are as follows:

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

Justification: Federal law and regulations require that individuals who have the most significant disabilities be selected for services before other eligible individuals with disabilities.

Outcome and Service Goal: Rehabilitate 2,175 individuals in this priority category.
Serve 20,500 individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by September 30, 2008.

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities.

Justification: Individuals in this category make up a large portion of the unemployed population with disabilities due to serious limitations of functional capacities and require special consideration in an order of selection.

Outcome and Service Goal: Rehabilitate 510 individuals in this priority category.
Serve 2,000 individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by September 30, 2008.

PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose Vocational Rehabilitation is expected to require multiple Vocational Rehabilitation services.

Justification: Individuals in this category are the most disabled of the group without significant disabilities due to their expected need for multiple services.

Outcome and Service Goal: Rehabilitate 200 individuals in this priority category.
Serve 500 individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by September 30, 2008.

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category.

Justification: This is a category to include all other eligible individuals. This category will assure all eligible individuals would receive services if sufficient funds are available to open this category.

Outcome and Service Goal: Rehabilitate 21 individuals in this priority category.
Serve 100 individuals in this priority category.

Time frame to achieve goal: Goal will be achieved by September 30, 2008.

DEFINITIONS

"Most Significant Disability" means the individual meets the criteria for having a significant disability but has a physical or mental impairment that seriously limits two or more functional capacities in terms of an employment outcome.

"Significant Disability" means the individual meets the three following criteria:

1. The individual has a severe physical or mental impairment which seriously limits at least one functional capacity (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and

2. The individual has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; **and**
3. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"**Non-Significant Disability**" means the individual does not meet the criteria for significant disability or the criteria for most significant disability.

"**Multiple Vocational Rehabilitation Services**" means two or more major VR services, i.e. physical or mental restoration, training, counseling, guidance and placement. Excluded are support services such as transportation, maintenance, and the routine counseling and guidance that should take place in every case.

"**Extended Period of Time**" means **6 months or more** from the date services are initiated.

Attachments to Title I State Plan**Attachment 4.11(c)(4) - Goals and Plans for Distribution of Title VI, Part B Funds**

The Division continues to provide Supported Employment services to eligible clients with the most significant disabilities who have been determined to require on-going support services in order to maintain employment.

Supported Employment services are funded through Title VI, Part B funds. As Title VI, Part B funds are depleted, the continuance of Supported Employment services is made possible through Title I, Part B funds. The Division anticipates spending in excess of **3.3 million dollars** of Title I, Part B funds in addition to its Title VI, Part B funding allotment (projected to be approximately \$510,199) in Fiscal Year 2008.

It is the continued goal of the Division to provide quality Supported Employment services which are delivered in an effective, efficient and timely manner. Supported Employment services are provided through Letters of Understanding with Community Rehabilitation Providers, and in cooperation with the Division of Mental Retardation Services and the Department of Mental Health and Developmental Disabilities. The Community Rehabilitation Providers must assure that on-going support services will be provided prior to the implementation of Supported Employment services.

The Division will continue to seek Community Rehabilitation Providers to provide Supported Employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division expects to serve in excess of **3,800** clients through the Supported Employment program during the Fiscal Year 2008 and achieve successful employment outcomes for **600** clients.

Attachments to Title I State Plan**Attachment 4.11(d) - State's Strategies and Use of Title I Funds for Innovation and Expansion Activities**

The State Plan shall include an assurance that the State will reserve and use a portion of the funds allotted to the State under Section 110 for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities, particularly individuals with the most significant disabilities, consistent with the findings of our statewide needs assessment and our goals and priorities.

Funds will be utilized in Fiscal Year 2008 for addressing the following priorities that continue to be identified in our Needs Assessment as they relate to individuals with the most significant disabilities, including those who need supported employment services; individuals with disabilities who are minorities; individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program; and individuals with disabilities served through other components of the statewide workforce investment system and personnel assisting those individuals through the components of the system: **Education and Training; Employment Opportunities; Information; Support Services; and Counseling and Guidance.**

1. Continue the practice of ensuring the availability of appropriate training activities and resources to meet the individualized needs of clients by seeking out and developing partnerships with other private and public entities to provide specialized education and training activities, to include those that can be provided through self-employment and on-the-job-training by employers.
2. Support expansion of Supported Employment services by actively seeking out Community Rehabilitation Providers that are willing to provide Supported Employment services to DRS clients with the most significant disabilities; and by continuing partnerships with the Department of Finance & Administration, Division of Mental Retardation and the Department of Mental Health and Developmental Disabilities in the development of innovative programs/services leading to employment of individuals deemed eligible for Supported Employment services.
3. Increase employment opportunities for clients through development of regional job coach pools; targeted marketing and education services to employers; and the provision of additional technical support and expertise to DRS staff and clients in the areas of technology, self employment, mental health and supported employment issues.
4. Continue the search for, and collaboration with, community rehabilitation providers within the state, especially in the more rural areas, to provide supported employment services to individuals with the most significant disabilities; continue efforts to improve services in collaboration with community rehabilitation providers who work with individuals with intellectual and mental health issues and provide services directly geared toward the successful employment of individuals with the most significant disabilities.

5. Support expansion of Transition School-to-Work services by continuing to work with Local Education Agencies (LEAs) in the maintenance of existing partnerships and the creation of additional partnerships to provide vocational rehabilitation services targeted specifically to that LEA's school system; continuing to work with and educate school personnel on the mission and scope of the Division of Rehabilitation Services in order to maximize services from both entities to better serve our mutual clientele.
6. Continue expansion (where appropriate) of and improvement in the service delivery of the Agency's 17 community Rehabilitation Centers and the comprehensive Tennessee Rehabilitation Center at Smyrna geared directly toward providing services leading to successful employment of individuals with the most significant disabilities.
7. Continue support of the Comprehensive System of Personnel Development (CSPD) initiative by increasing the number of slots available to the Tennessee Division of Rehabilitation Services through outreach and research; developing a strategy for recruiting vocational rehabilitation counselors who already meet the criteria for qualified rehabilitation counselor; and the continued financial support of books required by the CSPD programs.
8. Develop a marketing/outreach plan that targets and reaches unserved or underserved populations, such as Spanish-speaking clients and clients with traumatic brain injury, autism, deaf-blindness, and mental illness; targets individuals with disabilities who meet our Order of Selection open Priority Category 1 classification; targets SSA beneficiaries seeking employment; and that clearly conveys the employment purpose of our services.
9. Continue to expand the client intake process to encourage gathering of all needed client information to facilitate more discussion, as well as appropriate and targeted guidance and counseling, on the front end and throughout the client's vocational program. This counseling and guidance will incorporate considerations such as special needs and accommodations, SSA benefits and incentives, targeted training and employment exploration; and will facilitate exploration of specific resources and services that are available and/or that may be needed during their VR program and beyond.
10. Continue to support the Workforce Investment System by co-locating VR Counselors in each of the major WIA Service Delivery Area Career Centers and ensuring that all Career Center satellites also have VR Counselors assigned to visit their centers on a regular basis to work with individuals with disabilities that visit each center. Continue to provide cross training to the Career Center staff in regard to meeting the needs of individuals with disabilities. Continue to provide consultation on Career Center accessibility and accommodation needs in regard to the accessibility needs of the building(s) and accommodations in terms of appropriate technology needed to serve individuals with the most significant disabilities.
11. Support the Ticket to Work and Self-Sufficiency Program and use of other Social Security work incentives that benefit clients by continuing to have DRS staff dedicated to the Ticket to Work and Self-Sufficiency Programs. These staff members will provide expert advice to DRS staff, clients and families on the SSA work incentives in regard to educational and work incentives, including how clients can utilize SSA health benefits while in the VR program and how employment will affect such benefits upon successful employment.

12. Increase partnerships with transportation providers to expand options for clients to participate in vocational rehabilitation and to secure sustainable transportation for employment; improve communication, partnership among DRS and other state agencies, community resource providers, career centers, employers and disability service providers; provide in-house expert consultation to staff, clients and their families as it relates to SSA benefits and how their employment will affect those benefits; continue and seek out new partnerships with other agencies that are able to provide those support services not within the funding scope of DRS.
13. Increase training for counselors, evaluators and related vocational rehabilitation staff on how effective rehabilitation technology options lead to successful employment outcomes.
14. Continue to participate in Georgia State's Region IV Evidence Based Management Initiative work groups and other trainings which will help us to develop a common needs assessment method that will yield the information needed for evidence-based planning and decision-making throughout all levels of the DRS. This approach will build internal capacity to assess needs, produce managerially useful information, identify trends, and provide the assessment information to support management decisions.
15. Continue support of the State Rehabilitation Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care and personal assistance services).
16. Continue support of the Statewide Independent Living Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care and personal assistance services).
17. Continue to submit to the Commissioner an annual report of how funds are utilized relative to innovation and expansion activities.

Attachments to Title I State Plan**Attachment 4.11(e)(2) - Evaluation and Reports of Progress**

An evaluation of the effectiveness of Tennessee's Vocational Rehabilitation Program reflects the following accomplishments for Fiscal Year 2006:

1. The Division served **41,524** individuals with disabilities in Fiscal Year 2006. Two thousand nine hundred four **(2,904)** achieved successful outcomes (Rehabilitated).
2. Of the 2,904 successful outcomes, **2,620 (90.22%)** were individuals with significant disabilities.
3. Annualized earnings of the 2,904 individuals rehabilitated increased by **\$42,981,172.**

Before Rehabilitation - \$ 4,569,916
After Rehabilitation - \$ 47,551,088
4. The success rate achieved by the Division was **65.87%**. Tennessee's rate is consistent with the National average.
5. The Division achieved a **96.5%** satisfaction rating for successful outcome closures; an **87.3%** satisfaction rating for unsuccessful outcome closures and a **94.5%** satisfaction rating for active cases currently receiving services as reported by the Consumer Satisfaction Survey program for Fiscal Year 2006.
6. The State Rehabilitation Council (SRC), as required by the Rehabilitation Act, held all of its quarterly meetings. Council minutes are available upon request and in alternative formats.
7. The Division through its Tennessee Business Enterprise (TBE) Program operates 160 vending facilities. They generated over \$20 million in sales and produced an average net income per blind vendor that exceeded \$43,300.

The State Rehabilitation Council in its Annual Report on the Status of the Vocational Rehabilitation Program Operated within the State of Tennessee dated December 31, 2006, reflected on many of the above accomplishments in its report and commended the Division for an exceptional job providing quality and timely services to individuals with disabilities.

The Council strongly supports the continuing need for increasing the appropriation of State dollars to allow the Division to more effectively utilize the available Federal allotment under the Basic Support Program; thus allowing all eligible Tennesseans to be served.

An assessment of Tennessee's performance relative to Standards and Indicators pursuant to Section 106 of the Act reflects that the Division of Rehabilitation Services consistently meets or exceeds National averages. This assessment has been substantiated by the last two RSA Annual Monitoring activities.

The Division reserved funds allotted to the State under Section 110 to support Innovation and Expansion (I & E) activities in Fiscal Year 2006 as follows:

1. Improved and expanded placement services to increase the number of individuals with disabilities who were placed into competitive employment by:
 - A. Expanding placement services available to individuals eligible for Vocational Rehabilitation services through Community Rehabilitation Programs.
 - B. Increasing the availability and utilization of quality job readiness skills training to all customers with disabilities who demonstrated a need for these services.
 - C. Increasing employer and staff awareness and knowledge of Americans With Disabilities Act requirements and Section 504 requirements. Staff of the Division of Rehabilitation Services continued to coordinate and conduct regional workshops for employers and staff.
 - D. Increasing the number of clients placed into integrated competitive employments that were referred from the Division of Mental Retardation Services' Developmental Center program.
2. Expanded services to students with disabilities in the Transition From School To Work Program by increasing the number of Transition From School To Work Case Managers with special caseloads.

Attachment to Title VI, Part B Supplement to Title I State Plan**Attachment 6.3 - Quality, Scope and Extent of Supported Employment Services**

The Division continues to provide Supported Employment services to eligible clients with the most significant disabilities who have been determined to require on-going support services in order to maintain employment.

Supported Employment services are funded through Title VI, Part B funds. As Title VI, Part B funds are depleted, the continuance of Supported Employment services is made possible through Title I, Part B funds. The Division anticipates spending in excess of 3.3 million dollars of Title I, Part B funds in addition to its Title VI, Part B funding allotment (projected to be approximately \$510,199) in Fiscal Year 2008.

It is the continued goal of the Division to provide quality Supported Employment services which are delivered in an effective, efficient and timely manner. Supported Employment services are provided through Letters of Understanding with Community Rehabilitation Providers, and in cooperation with the Department of Finance & Administration, Division of Mental Retardation Services and the Department of Mental Health and Developmental Disabilities. The Community Rehabilitation Providers must assure that on-going support services will be provided prior to the implementation of Supported Employment services.

The number of supported employment providers has increased over the past two years to average 100 Supported Employment CRPs. While the number of CRPs may appear adequate to serve the Division's Supported Employment clients, there remains a shortage of CRPs able to provide supported employment services to persons involved in the state's de-institutionalization efforts. The Division will continue to enter into Supported Employment agreements with appropriate State Agencies, as well as private and/or non-profit agencies which have the capabilities of providing quality service delivery to include on-going support services. In this regard, the Division will assertively seek those agencies that will provide supported employment services to persons being transitioned from institutional settings to the community and to work in competitive, integrated employment settings.

The Division will continue to seek Community Rehabilitation Providers to provide Supported Employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division will continue to contract for services of the University of Tennessee Technology Inclusion and Employment Program (UT-CDE), Auburn University, and the Community Rehabilitation Provided-Rehabilitation Continuing Education Program (CRP-RCEP) through Georgia State University. These programs will provide continued technical assistance and training to the Division's staff and contracted Community Rehabilitation Providers. The UT-CDE program will aid in the monitoring of CRP services to assure competency and compliance. The UT-CDE program will provide innovative projects to improve Supported Employment Services. The UT-CDE program will conduct various studies of the components of the Supported Employment program and make recommendations for the improvements based upon these studies.

The Division expects to serve in excess of 3,800 clients through the Supported Employment program during the Fiscal Year 2008 and achieve successful employment outcomes for 600 clients.